

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	No. 20-CR-00006
)	
Plaintiff,)	INDICTMENT
)	
vs.)	Counts 1-6
)	18 U.S.C. § 1343: Wire Fraud
ROMEL MURPHY,)	
)	Count 7
Defendant.)	18 U.S.C. § 1028A: Aggravated
)	Identity Theft

The Grand Jury charges:

Counts 1-6

Wire Fraud

Introduction

1. Defendant began working for K.C., a national recording artist, as a road manager in October 2017. In approximately November 2017, K.C. fired defendant.

2. Defendant owned and operated a talent booking agency, Real Talent Media Group, LLC, also known as “Real Talent Marketing Group,” also known as “RTMG.” Defendant held himself out as the president and managing partner of Real Talent Media Group. Defendant, doing business as Real Talent Media Group, ostensibly booked artists for performances at concert venues located in and around the United States, including in the Northern District of Iowa.

The Scheme to Defraud

3. From on or about November 2017, to on or about March 2019, in the Northern District of Iowa and elsewhere, defendant ROMEL MURPHY devised and intended to devise a scheme and artifice to defraud his clients and others, and to obtain the moneys, funds, assets, and other property of those individuals, by means of false or fraudulent pretenses, representations, and promises ("the scheme to defraud"). In particular, defendant induced clients to wire funds to him to secure artists' appearances at performances that never occurred. Defendant solicited booking fees, deposits, and expense payments from his clients and others under the false pretense of arranging artists' performances. Defendant's clients and others sent at least \$250,000 in funds to accounts under defendant's control. Defendant then converted these funds to his own use.

Manner and Means of the Scheme to Defraud

4. The scheme and artifice to defraud and obtain money was carried out in the following manner, among others:

A. One of defendant's music industry contacts would request defendant book a performance of a particular national recording artist at a client's venue. Defendant would assure the client that he could book the artist. Defendant would then draft and send a fraudulent contract to the client that had been purportedly signed by a representative for the artist.

B. The contract would call for a deposit and/or other expenses to secure the artist's performance. The client would sign the contract and

wire the funds for the deposit/expenses to defendant's account.

Defendant would keep the money for his own purposes, including gambling. When the performances failed to occur, defendant would promise to refund the client's deposit. He would then create and send false wire transfer forms that would appear to show a wire from defendant's account to the client's account when no wire transfer had actually been initiated.

Execution of the Scheme to Defraud

5. From on or about November 2017, to on or about March 2019, in the Northern District of Iowa and elsewhere, defendant ROMEL MURPHY knowingly devised or intended to devise a scheme and artifice to defraud his clients and others, and to obtain the moneys, funds, assets, and other property of those individuals, by means of false or fraudulent pretenses, representations, and promises. Defendant ROMEL MURPHY knowingly executed and attempted to execute the scheme to defraud his clients and others by soliciting and inducing these individuals to send funds by wire transfer to accounts under defendant's control, including but not limited to the following:

Count	Account Holder	Date of Wire	From/To	Amount
1	R.E.	December 6, 2017	Iowa/Illinois	\$32,500
2	A.B.	December 7, 2017	Iowa/Illinois	\$20,000
3	A.B.	April 3, 2018	Iowa/Illinois	\$50,000
4	R.E.	April 9, 2018	Iowa/Illinois	\$50,000
5	A.B.	April 27, 2018	Iowa/Illinois	\$5,000

6

A.B.

April 30, 2018

Iowa/Illinois

\$7,632

This was in violation of Title 18, United States Code, Section 1343.

Count 7

Aggravated Identity Theft

6. On or about April 29, 2018, in the Northern District of Iowa and elsewhere, defendant ROMEL MURPHY, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to the offense of Wire Fraud, in violation of Title 18, United States Code, Section 1343, as charged in Counts 5 and 6. Specifically, defendant ROMEL MURPHY used the name of C.M., C.M.'s email address containing C.M.'s name, and the PayPal account of C.M.

7. This was in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL

/s/Foreperson

Grand Jury Foreperson

January 8, 2020
Date

PETER E. DEEGAN, JR.
United States Attorney

By:

[Signature]
KYNDRA LUNDQUIST
Assistant United States Attorney

